

**ROBINSON BROG LEINWAND GREENE  
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**Robert R. Leinwand**

**Hearing Date: July 15, 2009  
at 10:30 a.m.**

*Attorneys for the Debtor and Debtor in  
Possession*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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	:	Chapter 11
In re:	:	
	:	Case No.: 09-71979 (AST)
<b>CHAMPION MOTOR GROUP, INC.,</b>	:	
	:	
Debtor.	:	
	:	
-----	X	

**NOTICE OF MOTION PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 363 AND  
364 FOR FINAL FINANCING ORDER (I) AUTHORIZING DEBTOR  
TO OBTAIN POST-PETITION FINANCING; (II) MODIFYING THE  
AUTOMATIC STAY, AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that upon the above captioned debtor's Motion for Entry of an Order pursuant to 11 U.S.S. §§ 105, 361, 362, 363 and 364 for final financing order (i) authorizing debtor to obtain post-petition financing; (ii) modifying the automatic stay, and (iii) granting related relief dated June 30, 2009 (the "Motion"), the debtor and debtor in possession herein, **Champion Motor Group, Inc.** ( the“ Debtor”), by its attorneys, **Robinson Brog Leinwand Greene Genovese & Gluck P.C.**, will move before the **Honorable Alan S. Trust, United States Bankruptcy Judge, at the United States Bankruptcy Court, Long Island Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, on July 15,**

**2009 at 10:30 a.m.** (“Hearing Date”), or as soon thereafter as counsel can be heard, for the entry of an Order granting the Motion and for such other relief as is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the relief sought in the Motion must be in writing, setting forth the facts and authorities upon which an objection is based, and must be filed with the **Clerk of the Court, United States Bankruptcy Court, Long Island Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722**, with a copy to Chambers, provided, however, that pursuant to *general order* No. 462 re Electronic Case Filing Procedures (as amended from time to time), entities with Internet access shall file objections (formatted with Adobe Acrobat, rider 3.0), at <http://www.nyeb.uscourts.gov>, and served so as to be received by (i) **Robinson Brog Leinwand Greene Genovese & Gluck P.C., 1345 Avenue of the Americas, New York, New York 10105, Attn: Robert R. Leinwand, Esq.**, attorneys for the Debtor, (ii) **Olshan Grundman Frome Rosenzweig & Wolosky LLP, Park Avenue Tower, 65 East 55th Street. New York, NY 10022, Attn: Michael S Fox, Esq.**, attorneys for Champion Rescue LLC and (iii) the **Office of the United States Trustee, Eastern District of New York, Long Island Federal Courthouse, 560 Federal Plaza, Central Islip, New York 11722, Attention Stan Yang, Esq.**, no later than **three (3)** days prior to the Hearing Date.

**DATED:** New York, New York  
June 30, 2009

**ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK P.C.**

**Attorneys for the Debtor**  
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By: /s/ Robert R. Leinwand  
**Robert R. Leinwand**